

Raymond L. Bodnar, Esq.

Bodnar Trust U/A dated 12/28/2001

17008 SW Sapri Way

Port St Lucie FL 34986

908-752-5233

rbodnarpa@aol.com

United States District Court
For the District of Puerto Rico

In Re PROMESA

| | |
|----------------------------------|-------------------------------------|
| THE FINANCIAL OVERSIGHT AND | : Title III |
| MANAGEMENT BOARD FOR PUERTO RICO | : NO 17 BK 3283-LTS |
| As Representative of | : Affidavit Supporting |
| THE COMMONWEALTH OF PUERTO | : Motion for Reconsideration of the |
| Et al. | Order on January 20, 2022 Hearing |
| Debtors | : As to Claim 6850 |

I, Raymond L. Bodnar, attorney for Respondent, Bodnar Trust U/A dated 12/28/2001 hereby affirm the facts in this Affidavit in support of its motion for reconsideration of any order as to hearing date January 20, 2022 for the disallowance of claim No 6850:

1. On January 22, 2022, our office received a notice of hearing for Claim No 6850 to be held on January 20, 2022, which did not provide Respondent's

attorney any ample notice to request an adjournment or participate in that hearing.

2. Our office previously filed an objection to the disallowance of our claim 6850 since Bank of New York Mellon informed our office that the Bank of New York Mellon did not recognize our Bond HTA Cuspid No 745190R67.

3. The Debtor objected to our claim No 6850 that this claim was a duplicate of another bond in bankruptcy. Our office refuted that assertion that there are two separate claims for the same Bond. One claim was for HTA Bond and a separate claim for Puerto Rico Electric Authority Bond. The Debtor's attorney in its recent pleading did admit their error. Based upon this past error, the allegations of Debtor's attorney as to duplicate claim by Bank of New York Mellon without any verification from Bank of New York must be questioned.

4. The Debtor's attorney in its pleadings now alleges that the Bank of New York Mellon under its Master Claim No 38574, containing HTA Bond Cuspid No 745190ZR2 represents our HTA Bond Cuspid No 745190R2 as its basis for unverified allegation to disallow our claim as a duplicate claim.

5. Our prior pleadings, supported by affidavit, asserts that Bank of New York Mellon did not recognize our HTA Bond Cuspid No 745190R2.


6.. Our Bond Cuspid No is 745190R67 while Bank of New York Mellon Bond Cuspid No is 745190ZR2. The different Bond Cuspid numbers combined with our affidavit that Bank of New York Mellon did not recognize our Bond Cuspid No 745190R2, required the Debtor's attorney to obtain written verification from Bank of New York Mellon prior to submitting this unverified fact to this Court as its basis to disallow our Claim No 6850.

6.Our office attempted to obtain verification from Bank of New York Mellon by email on January 14, 2022, by telephone on January 17, 2022 and by letter, dated January 20, 2022 to verify or deny the allegations of the Debtor's attorney without success. (See attached Supporting Letter and email).

Based upon the foregoing, Respondent, Bodnar Trust U/A 12/28/2001, hereby submits this Motion for Reconsideration not to disallow HTA Bond Claim No 6850 until either Debtor or Respondent verify with Bank of New York Mellon whether the Debtor's allegations of duplicate claims are accurate. Without such verification, disallowance of our Claim No 6850 at this time by the Court and the denial of duplication by Bank of New York Mellon will result in no bankruptcy protection to the Respondent.

Dated

1/25/2022


Raymond L. Bodnar

Certification of Raymond L. Bodnar, Esq

I, Raymond L. Bodnar hereby certify and affirm that the foregoing
information is true. I am aware that if such information is willfully false, I am
subject to punishment.

Dated: 1/25/2022


Raymond L. Bodnar Esq,